

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON, )  
SERGIO DELEON, FLOYD J. CARRIER, )  
ANNA BURNS, MICHAEL MONTEZ, )  
PENNY POPE, OSCAR ORTIZ, KOBY )  
OZIAS, JOHN MELLOR-CRUMLEY, )  
PEGGY HERMAN, EVELYN BRICKNER, )  
GORDON BENJAMIN, KEN GANDY, )  
LEAGUE OF UNITED LATIN AMERICAN )  
CITIZENS (LULAC), AND DALLAS )  
COUNTY, TEXAS, ) CIVIL ACTION NO.  
*Plaintiffs,* ) 2:13-CV-193 (NGR)  
v. ) [Lead case]  
) )  
RICK PERRY, Governor of Texas; and JOHN )  
STEEN, Texas Secretary of State, )  
*Defendants.* )  
\_\_\_\_\_) )  
) )  
UNITED STATES OF AMERICA, )  
*Plaintiffs,* )  
) )  
TEXAS LEAGUE OF YOUNG VOTERS )  
EDUCATION FUND, AND IMANI CLARK, )  
*Plaintiff-Intervenors,* )  
) )  
TEXAS ASSOCIATION OF HISPANIC )  
COUNTY JUDGES AND COUNTY )  
COMMISSIONERS, HIDALGO COUNTY, )  
*Plaintiff-Intervenors,* )  
v. )  
) CIVIL ACTION NO.  
STATE OF TEXAS, JOHN STEEN, in his ) 2:13-CV-263 (NGR)  
official capacity as Texas Secretary of State; ) [Consolidated case]  
and STEVE McCRAW, in his official capacity )

as Director of the Texas Department of Public  
Safety,  
*Defendants.*

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TEXAS STATE CONFERENCE OF NAACP  
BRANCHES; and the MEXICAN  
AMERICAN LEGISLATIVE CAUCUS OF  
THE TEXAS HOUSE OF  
REPRESENTATIVES,  
*Plaintiffs,*

v.

JOHN STEEN, in his official capacity as  
Secretary of State of Texas; and STEVE  
McCRAW, in his official capacity as Director  
of the Texas Department of Public Safety,  
*Defendants.*

CIVIL ACTION NO.  
2:13-CV-291 (NGR)  
[Consolidated case]

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BELINDA ORTIZ, LENARD TAYLOR,  
EULALIO MENDEZ JR., LIONEL  
ESTRADA; ESTELA GARCIA ESPINOSA,  
LYDIA LARA, MARGARITO MARTINEZ  
LARA, MAXIMINA MARTINEZ LARA, AND  
*LA UNION DEL PUEBLO ENTERO, INC.*  
*Plaintiffs,*

v.

STATE OF TEXAS; JOHN STEEN, in his  
Official capacity as Texas Secretary of State;  
And STEVE McCRAW, in his official capacity  
As Director of the Texas Department of  
Public Safety,  
*Defendants.*

CIVIL ACTION NO.  
2:13-CV-348 (NGR)  
[Consolidated case]

**DEFENDANTS' NOTICE OF INTENTION TO TAKE ORAL DEPOSITION  
OF THE OFFICE OF THE INSPECTOR GENERAL**

To: The **United States Department of Justice, Office of the Inspector General, Oversight and Review Division, of the United States of America**, by and through its attorneys of record Anna Baldwin, Robert Berman, Richard Dellheim, Elizabeth S. Westfall, Avner Shapiro, Daniel Freeman, Jennifer Maranzano, John A. Smith, Meredith Bell-Platts, and Bruce Gear, Voting Section, Civil Rights Division, United States Department of Justice, Room 7254 NWB, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530.

Please take notice that on June 27, 2014 beginning at 9:30 A.M., at the law office of Donnell, Abernethy & Kieschnick, 555 N. Carancahua, Suite 1770, Corpus Christi, Texas 78401-0853, Defendants the State of Texas, Rick Perry, the Texas Secretary of State<sup>1</sup> and Steve McCraw, by and through the Attorney General for the State of Texas, will take the oral deposition of the United States Department of Justice, Office of the Inspector General, Oversight and Review Division, of the United States of America ("Office of the Inspector General") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

This deposition will be recorded by stenographic means, conducted before an individual authorized to administer oaths, and used for any purpose permitted under the Federal Rules of Civil Procedure or court order. The deposition may be videotaped. The deposition will continue from time to time and place to place until concluded.

The Office of the Inspector General is directed to designate a person or persons to testify on its behalf on the topic identified in Exhibit A.

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<sup>1</sup> Various complaints identify the Texas Secretary of State as John Steen. The current Secretary of State, however, is Nandita Berry.

**EXHIBIT A**

**TOPIC**

1. A Review of the Operations of the Voting Section of the Civil Rights Division, dated March 2013 and available at <http://www.justice.gov/oig/reports/2013/s1303.pdf>.

Dated: June 20, 2014

Respectfully submitted,

GREG ABBOTT  
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Solicitor General

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/s/ John B. Scott  
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COUNSEL FOR THE STATE OF TEXAS,  
RICK PERRY, JOHN STEEN, and STEVE  
MCCRAW

**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2014, a true and correct copy of the foregoing document is being served via electronic mail to all counsel of record.

/s/ John B. Scott  
JOHN B. SCOTT